

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

HARRISON HINES and ARGONAUTIC  
VENTURES MASTER SPC,

*Plaintiffs,*

vs.

AZOTH INVESTMENT SPC LTD., YUCHEN SHI  
a/k/a CASSANDRA SHI and TAMARA  
FRANKEL,

*Defendants.*

**DECLARATION OF TAMARA FRANKEL**

Pursuant to 28 U.S.C. § 1746, I, TAMARA FRANKEL, hereby declare under penalty of perjury as follows:

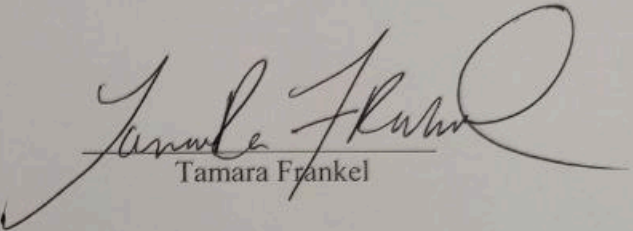
1. I reside in San Francisco, California and have done so since before the purchase and sale agreements that are the subject of this dispute were negotiated and executed.
2. The purchase and sale agreements pertained to cryptocurrency tokens issued by a Swiss company.
3. I did not negotiate the purchase and sale agreements in New York.
4. I did not perform any of the services called for by the purchase and sale agreements in New York.
5. The Complaint characterizes certain communications between myself and Plaintiff Hines related to the transactions in the contracts. Although I dispute the characterization of certain of the communications, all of the quoted communications—to the extent that they occurred—were sent from outside the State of New York.
6. I do not possess a New York driver's license nor do I pay any taxes in the State of New York.

7. I did not enter the State of New York for any purpose related to the contracts at issue in this dispute.

8. Although I dispute that I breached the contracts or am liable to Plaintiffs in any way, all of the conduct alleged—to the extent it occurred at all—occurred outside the State of New York.

9. I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 6<sup>th</sup> day of January, 2022

  
Tamara Frankel